

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION
CASE NOS.: 1:18-CR-47-RJC
1:18-CR-68-RJC
1:18-CR-88-RJC**

UNITED STATES OF AMERICA

v.

WANDA SKILLINGTON GREENE

DEFENDANT'S MOTION TO SEAL

NOW COMES Defendant Wanda Greene, through counsel and pursuant to Local Criminal Rule 49.1.1 and Local Civil Rule 6.1 (c), and moves that her Motion for Reconsideration of Order Denying Motion to Continue Sentencing be placed under seal. In support of this motion, the defense shows the Court:

1. Assistant U. S. Attorney Richard Edwards joins in this Motion to Seal and in the separately filed Motion For Reconsideration of Order Denying Motion to Continue.
2. The instant motion references the government's ongoing investigation into public corruption in Buncombe County. Rule 6 of the Federal Rules of Criminal Procedure imposes a broad rule of secrecy over matters occurring before the grand jury. The government has an independent interest in protecting the confidentiality of its investigation.
3. Sealing is therefore necessary and there are no alternatives in this instance.
4. In further support of this motion, the defense has submitted a memorandum, in accordance with Local Civil Rule 6.1 (c) (4), under seal.

5. The defense asks for sealing until the current grand jury investigation is complete. The defense has no objection to unsealing after the grand jury investigation is complete.

Dated: July 31, 2019

Respectfully submitted,

/s/ Noell P. Tin

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that he has served the foregoing DEFENDANT'S MOTION TO SEAL with the Clerk of Court using the CM/ECF system, which will send notification of such filing to opposing counsel:

Richard Edwards
Assistant U.S. Attorney
richard.edwards2@usdoj.gov

Dated: July 31, 2019

/s/ Noell P. Tin